

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

BARBARA FORLASTRO
AND ROBERT G. FORLASTRO,
AS CO-ADMINISTRATORS OF
THE ESTATE OF ROBERT J. FORLASTRO : CIVIL NO.: 3:06 CV 01541(RNC)
VS. :
JAMES COLLINS : FEBRUARY 19, 2007

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 7(b) of the Local Rules of Civil Procedure, the defendant, **James Collins**, respectfully moves for an extension of time to respond, by either answer or objection, to plaintiffs' Complaint. The defendant requests an extension of time to and including March 19, 2007, to respond, by either answer or motion to the plaintiffs' Complaint.

There is good cause for the requested extension since, although the undersigned is prepared to file a Motion to Dismiss, pursuant to the Court's standing orders a prefiling conference needs to be held before said filing is perfected. As such, the undersigned hereby

requests a thirty (30) day extension of time which will enable the parties to participate in said prefiling conference.

This is the defendant's second motion seeking an extension of time of this deadline. The undersigned has been unable to ascertain the position of Plaintiffs' counsel, Michael A. Stratton, regarding this request.

WHEREFORE, the defendant respectfully requests that his Motion for Extension of Time be granted.

Respectfully submitted,

THE DEFENDANT
James Collins

BY: _____
STEVEN J. ERRANTE, ESQ. (ct04292)
MARISA A. BELLAIR, ESQ. (ct23802)
Fed. Bar No. ct04292
Lynch, Traub, Keefe, & Errante
52 Trumbull Street
New Haven, CT 06510
Telephone: 203-787-0275
Facsimile: 203-782-0278

CERTIFICATION

I hereby certify that a copy of the above was sent electronically on February 19, 2007 to all counsel and *pro se* parties of record as follows:

Michael A. Stratton, Esq.
Stratton Faxon
59 Elm Street
New Haven, CT 06510

Steven J. Errante, Esq.